

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

VITALE AML CONSULTANTS, INC.,

Plaintiff,

v.

PROMONTORY FINANCIAL GROUP, LLC;  
PROMONTORY FORENSIC SOLUTIONS,  
LLC; HANI SAMAAN; PROMINENT IT  
SOLUTIONS, INC.; RONALD ROSE; AML  
CONSULTING SERVICES, INC.; and JOHN  
DOES (1-10),

Defendants.

X

Case No. 1:08-cv-1315  
(RMB)(RLE)**NOTICE OF MOTION  
TO ADMIT COUNSEL  
*PRO HAC VICE***

ECF Case

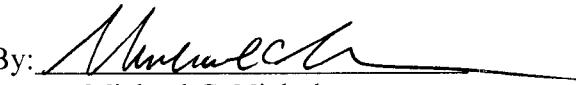
X

PLEASE TAKE NOTICE that, upon the annexed Declarations of Emily Johnson Henn and Michael C. Nicholson, and the exhibits attached thereto, Defendants Promontory Financial Group, LLC and Promontory Forensics Solutions, LLC will move this Court, before the Honorable Richard M. Berman, at the United States Courthouse, 500 Pearl Street, Room 21D, New York, New York as soon as counsel may be heard, for an Order pursuant to Local Civil Rule 1.3(c) of this Court admitting Emily Johnson Henn *pro hac vice* for all purposes in connection with the above-captioned action, and for such other and further relief as the Court may deem just and proper.

7/3/08  
#653752

Dated: New York, New York  
 July 3, 2008

COVINGTON & BURLING LLP

By:   
 Michael C. Nicholson

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*Attorneys for Defendants  
 Promontory Financial Group, LLC, and  
 Promontory Forensics Solutions, LLC*

TO:

<p>Dale M. Cendali, Esq.    Rhett Millsaps, Esq.    Claudia Ray, Esq.    Johanna Schmitt, Esq.    O'Melveny &amp; Myers LLP    Times Square Tower    7 Times Square    New York, NY 10036    dcendali@omm.com    rmillsaps@omm.com    cray@omm.com    jschmitt@omm.com</p> <p><i>Attorneys for Plaintiff</i></p>	<p>Jay B. Itkowitz, Esq.    Itkowitz &amp; Harwood    305 Broadway    New York, New York 10007    jitkowitz@itkowitz.com</p> <p><i>Attorneys for Defendants Hani Samaan,    Prominent IT Solutions, Inc.,    Ronald Rose, and    AML Consulting Services, Inc.</i></p>
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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

<hr/> <p>VITALE AML CONSULTANTS, INC.,</p> <p>Plaintiff,</p> <p>v.</p> <p>PROMONTORY FINANCIAL GROUP, LLC; PROMONTORY FORENSIC SOLUTIONS, LLC; HANI SAMAAN; PROMINENT IT SOLUTIONS, INC.; RONALD ROSE; AML CONSULTING SERVICES, INC.; and JOHN DOES (1-10),</p> <p>Defendants.</p> <hr/>	<p>X</p> <p>:</p> <p>:</p> <p>Case No. 1:08-cv-1315 (RMB)(RLE)</p> <p>:</p> <p>DECLARATION OF <b>MICHAEL C. NICHOLSON</b></p> <p>:</p> <p>ECF Case</p> <p>:</p> <p>X</p>
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Michael C. Nicholson declares as follows pursuant to 28 U.S.C. § 1746:

1. I am special counsel with the firm of Covington & Burling LLP, counsel for Promontory Financial Group, LLC and Promontory Forensics Solutions, LLC (collectively, “Promontory”) in the above-captioned action. I was admitted to practice before the U.S. District Court for the Southern District of New York on August 16, 1994, and remain in good standing therein. I submit this declaration in support of Promontory’s Motion to Admit Counsel *Pro Hac Vice* in connection with this action, pursuant to Local Civil Rule 1.3(c) of this Court.

2. I am familiar with Applicant Emily Johnson Henn, as she is a colleague with Covington & Burling LLP, practicing out of Covington’s Washington, D.C. office. I believe the Applicant to be an attorney of good character, competence, and experience.

3. Accompanying this declaration is the Declaration of Emily Johnson Henn, describing her experience and her familiarity with the Federal Rules of Civil Procedure, the Federal Rules of Criminal Procedure, the Federal Rules of Evidence, and the Local Rules of the United States District Court for the Southern and Eastern Districts of New York.

4. For the foregoing reasons, I respectfully request that the motion be granted. For the Court's convenience, a copy of a proposed order granting Promontory's motion is attached hereto as Exhibit A.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 3rd day of July, 2008, in New York, New York.



Michael C. Nicholson

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

VITALE AML CONSULTANTS, INC.,  v.  PROMONTORY FINANCIAL GROUP, LLC; PROMONTORY FORENSIC SOLUTIONS, LLC; HANI SAMAAN; PROMINENT IT SOLUTIONS, INC.; RONALD ROSE; AML CONSULTING SERVICES, INC.; and JOHN DOES (1-10),  Defendants.	X : : Case No. 1:08-cv-1315 (RMB) : <b>ORDER FOR ADMISSION  <i>PRO HAC VICE ON  WRITTEN MOTION</i></b> : ECF Case : X
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This matter having been brought before the Court by Defendants Promontory Financial Group, LLC and Promontory Forensics Solutions, LLC, through counsel Covington & Burling LLP, by motion pursuant to Local Civil Rule 1.3(c) for an order admitting Emily Johnson Henn *pro hac vice*, on notice to all parties hereto, and the Court having reviewed and considered the papers filed in support of this motion, and in opposition thereto, if any, it is hereby

ORDERED that Emily Johnson Henn be and hereby is admitted *pro hac vice* in connection with this action and she shall abide by the provisions of the Local Rules of this Court in all respects and be subject to the disciplinary jurisdiction of the Court in accordance with Local Civil Rule 1.5.

SO ORDERED:

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U.S.D.J.

CERTIFICATE OF SERVICE

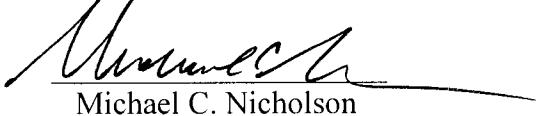
I hereby certify that I caused true and correct copies of the foregoing **Notice of Motion to Admit Counsel Pro Hac Vice** dated July 3, 2008, with supporting **Declaration of Emily Henn**, dated July 2, 2008, and **Declaration of Michael C. Nicholson**, dated July 3, 2008, to be served via electronic mail, pursuant to the agreement of counsel for the parties, upon the following counsel of record in the within action (08-CV-1315 (RMB) (RLE)), on this 3rd day of July, 2008:

Dale M. Cendali, Esq.  
Rhett Millsaps II, Esq.  
Claudia Ray, Esq.  
Johanna Schmitt, Esq.  
O'Melveny & Myers LLP  
Times Square Tower  
7 Times Square  
New York, NY 10036  
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jschmitt@omm.com

*Attorneys for Plaintiff*

Jay B. Itkowitz, Esq.  
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305 Broadway  
New York, New York 10007  
jitkowitz@itkowitz.com

*Attorneys for Defendants Hani Samaan,  
Prominent IT Solutions, Inc.,  
Ronald Rose, and  
AML Consulting Services, Inc.*



Michael C. Nicholson

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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VITALE AML CONSULTANTS, INC.,	:	X
	:	:
Plaintiff,	:	Case No. 1:08-cv-1315 (RMB)
	:	
v.	:	
	:	
PROMONTORY FINANCIAL GROUP, LLC;	:	<b>DECLARATION OF</b>
PROMONTORY FORENSIC SOLUTIONS,	:	<b>EMILY JOHNSON HENN</b>
LLC; HANI SAMAAN; PROMINENT IT	:	
SOLUTIONS, INC.; RONALD ROSE; AML	:	
CONSULTING SERVICES, INC.; and JOHN	:	
DOES (1-10),	:	ECF Case
	:	
Defendants.	:	
	:	X

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Emily Johnson Henn declares as follows pursuant to 28 U.S.C. § 1746:

1. I am a partner with the firm of Covington & Burling LLP, resident of the District of Columbia, and counsel for Defendants Promontory Financial Group, LLC and Promontory Forensics Solutions, LLC (together, "Promontory") in the above-captioned matter.

2. I submit this Declaration in support of Promontory's Motion to Admit Counsel *pro hac vice* in connection with this action pursuant to Local Civil Rule 1.3(c) of this Court.

3. I have been admitted to practice in the District of Columbia since March 9, 2001, and I am currently in good standing in the Bar of the District of Columbia. A certificate of good standing from the District of Columbia Court of Appeals is annexed hereto as Exhibit 1. I

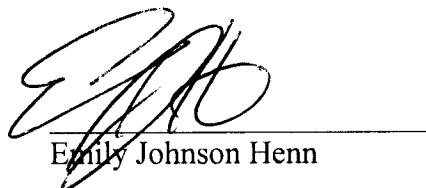
have been admitted to practice in the Commonwealth of Maryland since December 15, 1999. A certificate of good standing for the Commonwealth of Maryland is annexed hereto as Exhibit 2.

4. I have read and am familiar with (a) the provisions of the Judicial Code which pertain to the jurisdiction of, and practice in, the United States District Courts; (b) the Federal Rules of Civil Procedure; (c) the Federal Rules of Criminal Procedure; (d) the Federal Rules of Evidence; and (e) the Local Rules of the United States District Court for the Southern and Eastern Districts of New York.

5. I will faithfully adhere to all rules applicable to my conduct in connection with any activities of this Court.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 2nd day of July, 2008 in Washington, D.C.



Emily Johnson Henn



District of Columbia Court of Appeals  
Committee on Admissions  
500 Indiana Avenue, N.W. — Room 4200  
Washington, D.C. 20001  
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

EMILY J. HENN

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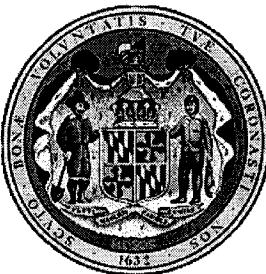
was on the 9<sup>th</sup> day of MARCH, 2001,  
duly qualified and admitted as an attorney and counselor and  
entitled to practice before this Court and is, on the date  
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have  
hereunto subscribed my name  
and affixed the seal of this  
Court at the City of  
Washington, D.C., on June  
18, 2008.

GARLAND PINKSTON, JR., CLERK

By: *Emily J. Henn*  
Deputy Clerk

**Court of Appeals  
of Maryland  
Annapolis, MD**



***CERTIFICATE OF GOOD STANDING***

*STATE OF MARYLAND, ss:*

*I, Bessie M. Decker, Clerk of the Court of Appeals of Maryland, do hereby certify that on the fifteenth day of December, 1999,*

***Emily Johnson Henn***

*having first taken and subscribed the oath prescribed by the Constitution and Laws of this State, was admitted as an attorney of said Court, is now in good standing, and as such is entitled to practice law in any of the Courts of said State, subject to the Rules of Court.*

*In Testimony Whereof, I have hereunto set my hand as Clerk, and affixed the Seal of the Court of Appeals of Maryland, this twenty-third day of June, 2008.*

*Bessie M. Decker*

*Clerk of the Court of Appeals of Maryland*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

VITALE AML CONSULTANTS, INC.,	:	X
Plaintiff,	:	
v.	:	Case No. 1:08-cv-1315 (RMB)
PROMONTORY FINANCIAL GROUP, LLC;	:	<b>ORDER FOR ADMISSION</b>
PROMONTORY FORENSIC SOLUTIONS,	:	<b><i>PRO HAC VICE ON</i></b>
LLC; HANI SAMAAN; PROMINENT IT	:	<b>WRITTEN MOTION</b>
SOLUTIONS, INC.; RONALD ROSE; AML	:	
CONSULTING SERVICES, INC.; and JOHN	:	
DOES (1-10),	:	ECF Case
Defendants.	:	
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SO ORDERED:

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U.S.D.J.